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*[Additional Counsel for Defendant
continued on next page]*

*Attorneys for Defendant,
Redwood Capital Management, LLC*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

vs.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign
entity; MINDGEEK USA
INCORPORATED, a Delaware
corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC,
INC., a foreign entity; BERND
BERGMAIR, a foreign individual;
FERAS ANTOON, a foreign individual;
DAVID TASSILLO, a foreign
individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD

CASE NO. 2:24-cv-04786-WLH-ADS

**DEFENDANT REDWOOD
CAPITAL MANAGEMENT, LLC'S
NOTICE OF MOTION AND
MOTION TO DISMISS
COMPLAINTS IN RELATED
CASES**

Date: January 31, 2025
Time: 1:30 p.m.
Place: Courtroom 9B
Judge: Hon. Wesley L. Hsu

Complaint filed: June 7, 2024

[Memorandum of Points and
Authorities, and Request for Judicial
Notice filed concurrently herewith]

DOE FUNDS 1-7; COLBECK
CAPITAL MANAGEMENT, LLC, a
Delaware company, COLBECK DOE
FUNDS 1-3,

Defendants.

1 *[Additional Counsel for Defendant continued from caption page]*

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on January 31, 2025, at 1:30 p.m., or as soon thereafter as the parties may be heard, in the United States District Court for the Central District of California, located at 350 West First Street, Los Angeles, California 90012, before the Honorable Wesley Hsu in Courtroom 9B, Defendant Redwood Capital Management, LLC (“Redwood Defendant” or “Redwood”) will, and hereby does, move this Court pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss, with prejudice, all claims asserted against Redwood in the individual Complaints (the “Related Cases”) filed by Plaintiffs A.K., W.P., L.S., W.L., C.S., S.O., J.C., K.A., N.L., T.C., X.N., N.Y., L.T., and J.L. (collectively, “New Plaintiffs”).

This Motion is made pursuant to a Joint Stipulation to Request Limited Coordination for Purposes of Responding to Complaints in Related Cases (*see* Case No. 2:21-cv-04920, Dkt. 472), whereby the parties agreed to address the grounds for dismissal on all legal issues implicated by each of the Related Cases in one omnibus motion to dismiss per Defendant.

This Motion is made following the conference of counsel, pursuant to Local Rule 7-3, which took place via Zoom videoconference on October 14, 2024.

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities, and Request for Judicial Notice in support hereof, all filed and served concurrently herewith, the pleadings, records, and files in this action, and any other matters that may properly come before the Court at or before the hearing on this Motion.

1 DATED: October 30, 2024

PAUL HASTINGS LLP

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3 By: /s/ James M. Pearl

4 JAMES M. PEARL

5 *Attorneys for Defendant Redwood*
6 *Capital Management, LLC*
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